



**Zion Hill**  
Missionary Baptist  
Church

Received & Inspected

JAN 17 2012

FCC Mail Room

Office of the Secretary  
Federal Communications Commission  
Disability Rights Office  
Room 3-B431  
9300 East Hampton Drive  
Capitol Heights, MD 20743

January 12, 2012

Re: Petition for Undue Burden Exemption from Closed Captioning Rules

To Whom It May Concern:

This letter requests an exemption on behalf of Zion Hill Missionary Baptist Church in Indianapolis from the FCC's closed captioning rules based on undue burden. The original and two copies of this letter and all support are being provided.

Zion Hill Missionary Baptist Church is a donor supported non-profit organization under the laws of the state of Indiana. Since 2010, we have produced a weekly 30-minute television program. The program teaches and inspires viewers how to develop their relationship with God and is produced locally by the Zion Hill Missionary Baptist Church staff. It is broadcast to the public on WHMB-TV throughout Central Indiana. Zion Hill Missionary Baptist Church pays WHMB-TV \$225.00 per week to air the show over its broadcast facilities.

Captioning the program would present an undue burden for several reasons:

1. We do not have the financial resources to caption the program ourselves. Our research has determined it would cost \$5,000-8,000 to purchase the necessary equipment and the church is unable to take on that cost at this time.



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2. Being a small church, production of the program is done by a few volunteers and the additional expertise and manpower to caption each program is not available.
3. We've also explored closed captioning services. This would cost an additional \$250 per week or \$13,000 per year. The added cost for captioning would make production of the program unaffordable and the time for captioning would make meeting WHMB-TV's air date deadlines impossible.
4. WHMB-TV does not provide closed captioning and has said it is unlikely to do so in the foreseeable future because of the additional time and staff that would be required.
5. As a church, we have attempted to solicit sponsorships to pay for the cost of closed captioning, but have been unsuccessful.

Providing closed captioning would ultimately cause us to either terminate or severely limit production of the program and cause us to lose supporters who would no longer be able to regularly view the program.

While Zion Hill Missionary Baptist Church recognizes the importance closed captioning can have, based on the above facts set forth in this letter, we respectfully request that Zion Hill Missionary Baptist Church be granted an undue burden exemption from the captioning requirements.

Respectfully:

Zion Hill Missionary Baptist Church

By: \_\_\_\_\_

Printed Name: \_\_\_\_\_

CHARLES LEE

Title: \_\_\_\_\_

MEDIA DIRECTOR



Charles Lee  
Media Director  
Zion Hill Missionary Baptist Church  
1610 E. 19<sup>th</sup> Street  
Indianapolis, IN 46218

January 10, 2012

Charles,

This letter is in response to your request for LeSEA Broadcasting to research the process and cost associated with closed captioning your television program that currently airs on WHMB-TV.

There are two ways to approach this issue:

- Purchase the captioning software/hardware and do the closed captioning yourself. Research by both the WHMB-TV production and engineering staffs has discovered the cost of this equipment will be in the \$5,000-8,000 range. The CC process involves multiple steps. First, the program must be transcribed word-for-word into an electronic document. Second, the script is entered in the CC software. Third, the software drops the script onto a timeline of the program. Fourth, the program can then be outputted with the embedded CC. In our experience, we've noted that it takes 4-6 hours to CC a 30-minute program such as yours.
- Outsource the closed captioning to an outside provider. Again, we've researched this solution and have discovered the cost to be approximately \$250 per program.

WHMB-TV does not currently offer in-house closed captioning services. Because closed captioning is such a labor-intensive process, we would have to hire additional staff to perform this task and that is not economically feasible at this time.

I hope this information answers your questions about the closed captioning process and the associated costs. Please don't hesitate to contact me with any further questions.

Sincerely,

*Bob Poplin*

Bob Poplin  
WHMB-TV